

US EPA ARCHIVE DOCUMENT

The table below summarizes the benefits and cautions to be aware of with *Early Action Compacts*.

Benefits	Cautions
<i>Early Action Compacts</i> give certain local areas the flexibility to develop their own approach to meeting the 8-hour ozone standard, provided the communities control emissions from local sources earlier than the Clean Air Act would otherwise require.	<p>Success depends on active and sustained participation by all stakeholders.</p> <p>Like most voluntary programs, Early Action Compacts are vulnerable to legal challenge.</p>
For <i>Early Action Compact</i> areas, if all terms of the agreement are met, EPA would defer the effective date of the nonattainment designation. On that date, state or local environmental agencies must start developing and carrying out a plan to clean the air.	<i>Early Action Compact</i> areas (as well as non-compact areas) that EPA classifies as maintenance areas for the ozone 1-hour standard would still be subject to transportation conformity requirements while the maintenance plan for the area is still in force under the Clean Air Act. EPA is considering options for the period of time in which the maintenance plan would be in force
	Early Action Compact areas in the Ozone Transport Region are still subject to nonattainment new source review in accordance the Clean Air Act.
People living in areas that realize reductions sooner will enjoy the health benefits of cleaner air sooner than what might otherwise be possible.	Because they are not considered nonattainment until the effective date of the nonattainment designation, <i>Early Action Compact</i> areas are not eligible for CMAQ funds.
Reductions in emissions from pollution control measures that are implemented as part of an <i>Early Action Compact</i> are creditable toward air quality planning goals.	<i>Early Action Compact</i> areas have an aggressive, accelerated program of milestones to meet. An area that misses a milestone will lose its deferral of the effective nonattainment date and as such, be subject to all of the requirements for nonattainment areas, such as new source review and transportation conformity.